



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 10, 2020

By ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Daniel Melamed*, S1 19 CR 443 (LAK)

Dear Judge Kaplan,

The Government submits this letter to request respectfully, with the defendant's consent, that the Court exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7) from today, July 10, 2020, through a control date of convenience to the Court during the week of September 14, 2020. Previously, the Court so excluded time through a control date of July 8, 2020. In light of the prior adjournment of the trial of the defendant *sine die* amidst the continued circumstances relating to the declaration of a national emergency concerning the coronavirus pandemic and the ongoing uncertainty with respect to the full reopening of the Southern District of New York, the parties request respectfully a control date with an exclusion of time through it on the basis that the ends of justice served by such an exclusion outweigh the best interest of the public and the defendant in a speedy trial insofar as the parties will continue to provide and review discovery, prepare for trial once one becomes possible again, and further discuss a possible pre-trial disposition.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: Thomas John Wright
Thomas John Wright
Kyle A. Wirshba
Assistant United States Attorneys
(212) 637-2295 / 2493

cc: Kevin Keating (Counsel to Defendant Daniel Melamed) (by ECF)

A control conference is scheduled for 9/15/2020 at 10:30 am. Time excluded to and including that date. The interests of justice served thereby outweigh the interests of the public and the defendant in a speedy trial for the reasons stated above.

7/10/2020

USDJ